

Abdul Hassan Law Group, PLLC
215-28 Hillside Avenue
Queens Village, New York, 11427

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**Abdul K. Hassan, Esq.**  
Email: [abdul@abdulhassan.com](mailto:abdul@abdulhassan.com)  
***Employment and Labor Lawyer***

Tel: 718-740-1000  
Fax: 718-740-2000  
Web: [www.abdulhassan.com](http://www.abdulhassan.com)

**January 17, 2024**

**Via ECF**

Hon. Jesse M. Furman, USDJ  
United States District Court, SDNY  
500 Pearl Street  
New York, NY 10007

**Re: Gayle v. Advanced Clean-Up Technologies Inc. et al**  
**Case No. 23-CV-04987 (JMF)(SLC)**  
**Motion for Extension of Time**

Dear Judge Furman:

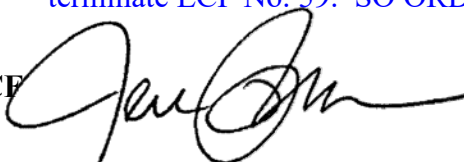
My firm represents Plaintiff in the above-referenced action, and I respectfully write on consent to request a brief one-week extension of the January 19, 2024 deadline for Plaintiff to file his opposition to the motion to compel filed by Defendant Advanced Clean-Up Technologies Inc. This request is being made because the parties have made significant progress in settlement discussions and are very close to reaching resolution – the additional time is needed to get certain approval by the defense to close the gap that remains. We expect this to be the final request for extension one way or the other. The parties would like to divert resources from motion practice/litigation towards a settlement. A corresponding adjournment of the January 26, 2024, deadline for Defendant to file its reply papers, if any, is also requested.

I thank the Court in advance for its time and consideration.

Respectfully submitted,  
Abdul Hassan Law Group, PLLC  
/s/ Abdul Hassan  
By: Abdul K. Hassan, Esq.

Application GRANTED. The deadline for Plaintiff to file his opposition is extended to **January 26, 2024** and the deadline for Defendant to file any reply is **February 2, 2024**. No further extensions will be granted. The Clerk of Court is directed to terminate ECF No. 59. SO ORDERED.

cc: **Defense Counsels via ECF**



January 17, 2024